

**Before the
Federal Communications Commission
Washington, D.C. 20054**

In the Matter of)	
)	
Guidelines for Cellular)	WT Docket No. 00-239
SID Administrators)	

Comments of Telcordia Technologies

Pursuant to Public Notice¹, Telcordia Technologies submits the following Comments on the Federal Communications Commission’s (FCC) proposed general Guidelines for Cellular SIDS. Telcordia appreciates the opportunity to provide its comments to the FCC regarding the above referenced Docket. Our comments fall into two categories: 1) those that relate directly to the text currently contained in the FCC’s proposed *Guidelines for Cellular SID Administrators* (“Guidelines”); and 2) those that relate to the FCC’s intended process for the further development of the Guidelines.

I. Specific Recommendations for General Guidelines Text

Telcordia recommends that Section 2.0 – *Cellular SID Function* of the general Guidelines be expanded. The current text defines the basic SID function for analog systems. Digital systems, e.g., TDMA and CDMA, utilize SIDs for these described functions as well, but also use SIDs for additional and important preferences, such as home carrier, preferred roaming, non-preferred roaming, barred roaming, and important billing functions such as identifying the carrier, or portion of the carrier’s network, at

which a billed service occurred. One of the key responsibilities of resource Guidelines is to provide the resource Administrator a complete description of the legitimate functions of the resource in order to ensure that the resources are made available for all such functionalities.

Telcordia further recommends that Section 3.0 – *Assumptions and Constraints*, contain a specific constraint that FCC-recognized Administrators cannot be entities that are directly involved in the competitive offering of wireless services. Not only would such entities, if selected to be SID Administrators, have inherent conflicts of interest, i.e., potentially assigning SID resources to themselves and/or denying them to their competitors, but also, more importantly, such entities may potentially have access to some proprietary information of their competitors which is required to be provided on resource applications. Appropriate conflict of interest and impartiality rules are contained in the FCC's rules, 47 C.F.R. § 52.12, that could be applicable in the SID context as well.

Telcordia also recommends that Section 3.0 – *Assumptions and Constraints*, be revised to reflect recognition of the SID-related responsibilities of the International Forum on ANSI-41 Standards Technology (IFAST). The IFAST has been designated by the domestic and international wireless community to assign blocks of SIDs to all countries for domestic use. In the US context, if additional blocks of SIDs are necessary for domestic use, the US SID Administrator would apply to the IFAST for such additional resources. This function/responsibility should be properly recognized in the Guidelines.

¹ Public Notice, *Commercial Wireless Division Seeks Comment on its Proposed Guidelines for Cellular Administrators*, DA 03-864, WTC Docket No. 00-239, released March 25, 2003.

Telcordia recommends that Section 3.0 – *Assumptions and Constraints*, contain recognition of the SID-related responsibilities of Cibernet. Cibernet is the BID code Administrator. BID codes, when assigned to cellular service providers for billing functions are allocated directly from the inventory of SIDs and, therefore, such assignments must be coordinated with the SID Administrator in order to avoid assignment conflicts and ambiguities.

Telcordia recommends that reference to the FCC’s \$85 fee be deleted from paragraph 5.7 of Section 5.0 – *Responsibilities of Cellular SID Administrators*. Although this historical information is important to the further development of Section 7 and should, therefore, be shared with the developers, it should not be included in a general Guidelines document.

II. Recommendations Related to the Proposed Guidelines Development Process

Telcordia recommends that the process for the further development of the Guidelines, particularly Section 7 – *Cellular SID Assignment Procedures*, include cellular industry representatives in addition to FCC-recognized administrators. The expertise of these entities, particularly with regard to the uses, functions, and assignment/reclamation procedures of SIDs, would be invaluable. It might be appropriate for the FCC-recognized Administrators to sponsor/host the Guidelines development effort in an open industry forum that would evolve to a standing SID oversight committee for the ongoing resolution of SID administrative issues and the updating of the Guidelines when required.

We also believe, as we explained in our initial set of proposed guidelines, that the FCC's intent to certify numerous SID Administrators may be misplaced. The market for such a small resource with a very limited quantity of resource applications will not support multiple Administrators. We believe that the FCC should consider appointing/procuring the services of a single administrator for a specific length of time and whose term as Administrator would be subject to periodic competition.

Telcordia further recommends that the effort to further develop the Guidelines not be limited to the completion of Section 7. The FCC-recognized Administrators and the cellular industry (per the above recommendation) should also be authorized to review and recommend enhancements to all Sections of the proposed Guidelines. As often occurs with such efforts, the very process of the development of the technical components of a Guidelines document is likely to yield recommendations for future appropriate revisions to the General sections as well. Telcordia believes that such an expanded effort would ultimately result in the development of the best possible and most complete Guidelines.

In conclusion, Telcordia requests that the Commission adopt Guidelines consistent with the foregoing recommendations.

Respectfully submitted,

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